



April 29, 2011

Louisiana Department of Environmental Quality  
Office of Environmental Services  
Water Permits Division  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313  
Attention: Ms. Christy Clark

RE: Addendum to Application for Renewal of LPDES Permit Number LA0003824  
Firestone Polymers, LLC  
Lake Charles Facility  
Sulphur, Louisiana  
Agency Interest Number 1244

Dear Ms. Clark:

Providence on behalf Firestone Polymers, LLC (Firestone) is hereby submitting an addendum to the Louisiana Pollutant Discharge Elimination System (LPDES) permit application for the renewal of LPDES permit number LA0003824 for the Firestone Polymers, LLC, Lake Charles Facility located in Sulphur, Calcasieu Parish, Louisiana.

As per our discussions, Firestone is hereby updating the Outfall 003 and 004 effluent descriptions to include several miscellaneous intermittent discharges. Additionally, the production numbers presented in the December application are significantly lower than the numbers utilized to calculate the technology based limitations in the previous permit. Due to depressed economic conditions in recent years, some units at the Firestone Lake Charles Facility have experienced a decrease in production that is not anticipated to last throughout the upcoming five-year term of the renewal permit. Firestone recognizes that the technology based effluent limitations based on these inaccurate production rates will result in lower effluent limitations that would warrant major modification of the permit in the near future. Firestone is hereby providing updated production numbers to be utilized in calculation of the technology based effluent limitations in the renewal permit based upon best engineering estimates and accounting projections.

Please replace the pages in the original December 27, 2010 permit application with the attached.

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If you have questions regarding this submittal, please contact me (225) 766-7400.  
Thank you for your assistance in this matter.

Sincerely,  
Providence



Aimee' R. Killeen  
Environmental Scientist Project Director

Enclosures

Cc/w Enclosures:

Firestone Environmental Department

## 8.0 REQUESTED PERMIT CONDITIONS

### 8.1 Description of Outfalls

Firestone is requesting the following outfall descriptions to be used in renewal of the LPDES permit:

- Outfall 001, the continuous discharge of treated process wastewater, process area storm water, sanitary wastewater, and first-flush non-process area storm water.
- Outfall 003, the intermittent discharge of non-process area storm water from the west side of the facility and the intermittent discharge of miscellaneous allowable non-storm water discharges including but not limited to fire water, potable water, condensate, general facility wash waters (without soaps), irrigation water, eye wash and safety shower waters, and ground water/well water.
- Outfall 004, the intermittent discharge non-process area storm water from the east side of the facility and the intermittent discharge of miscellaneous allowable non-storm water discharges including but not limited to fire water, potable water, condensate, general facility wash waters (without soaps), irrigation water, eye wash and safety shower waters, and ground water/well water.

### 8.2 Monitoring Frequency Reduction at 001

Firestone is requesting monitoring frequency reductions at Outfall 001 for total suspended solids (TSS), and oil and grease based upon the USEPA's *Interim Guidance for Performance-Based Reduction of NPDES Permit Monitoring Frequencies* (April 1996). Firestone has not experienced a violation for either of these parameters at Outfall 001 in the previous two years.

Based on the data presented below, Firestone is requesting that the TSS and oil and grease monitoring frequency at Outfall 001 be reduced from 3/week to 1/week.

DATE	TSS lbs/day	Oil & Grease lbs/day
July-08	164	67
August-08	340	73
September-08	209	49
October-08	322	56
November-08	382	52
December-08	430	62
January-09	351	55

LA0003824

Please print or type in the unshaded areas only.

FORM 2C NPDES	EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURAL OPERATIONS Consolidated Permits Program					
<b>I. OUTFALL LOCATION</b>							
For each outfall, list the latitude and longitude of this location to the nearest 15 seconds and the name of the receiving water.							
OUTFALL NUMBER (list)	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER (name)
	1. DEG.	2. MIN.	3. SEC.	1. DEG.	2. MIN.	3. SEC.	
001	30	11	27	93	20	02	Calcasieu River via Bayou D'Inde
003	30	11	24	93	20	02	Calcasieu River via Bayou D'Inde
004	30	11	27	93	20	00	Calcasieu River via Bayou D'Inde
<b>II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES</b>							
A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined (e.g., for certain mining activities), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures. See Figure 3							
B. For each outfall, provide a description of: (1) all operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) the average flow contributed by each operation; and (3) the treatment received by the wastewater. Continue on additional sheets if necessary.							
1. OUTFALL NO. (list)	2. OPERATION(S) CONTRIBUTING FLOW			3. TREATMENT			
	a. OPERATION (list)		b. AVERAGE FLOW (include units)	a. DESCRIPTION	b. LIST CODES FROM TABLE 2C-1		
001	Treated Process Wastewater		1.23 MGD Average  1.44 MGD 30-Day Max	Neutralization Aerated Lagoon Flocculation Clarification Dissolved Air Flotation	2-K		
	Treated Process Area Storm Water				3-B		
	Treated First-Flush Non-Process Area Storm Water Runoff				1-G		
	Treated Sanitary Wastewater			Imhoff Tank Chlorination	1-H 2-H		
003	Non-Process Area Storm Water Runoff and the intermittent discharge of miscellaneous allowable non-storm water discharges including but not limited to fire water, potable water, condensate, general facility wash waters (without soaps), irrigation water, eye wash and safety shower waters, and ground water/well water		4.04 MGD Average  24.96 MGD 30-Day Max	Discharge to Surface Waters	4-A		
004	Non-Process Area Storm Water Runoff and the intermittent discharge of miscellaneous allowable non-storm water discharges including but not limited to fire water, potable water, condensate, general facility wash waters (without soaps), irrigation water, eye wash and safety shower waters, and ground water/well water		7.22 MGD Average  43.61 MGD 30-Day Max	Discharge to Surface Waters	4-A		

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C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☐ YES (complete the following table)☒ NO (go to Section III)

1. OUTFALL NUMBER <i>(list)</i>	2. OPERATION(s) CONTRIBUTING FLOW <i>(list)</i>	3. FREQUENCY		4. FLOW				
		a. DAYS PER WEEK <i>(specify average)</i>	b. MONTHS PER YEAR <i>(specify average)</i>	a. FLOW RATE <i>(in MGD)</i>		b. TOTAL VOLUME <i>(specify with units)</i>		c. DUR- ATION <i>(in days)</i>
				1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERM AVERAGE	2. MAXIMUM DAILY	

**III. PRODUCTION**

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☒ YES (complete Item III-B)☐ NO (go to Section IV)

B. Are the limitations in the applicable effluent guideline expressed in terms of production (or other measure of operation)?

☒ YES (complete Item III-C)☐ NO (go to Section IV)

C. If you answered "yes" to Item III.B, list the quantity which represents an actual measurement of your level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. AVERAGE DAILY PRODUCTION			2. AFFECTED OUTFALLS (list outfall numbers)
a. QUANTITY PER DAY	b. UNITS OF MEASURES	c. OPERATION, PRODUCT, MATERIAL, ETC. (specify)	
1,304,000	lbs/day	Solution Crumb Rubber	001
427,000	lbs/day	Amine Related Product	001

**IV. IMPROVEMENTS**

A. Are you now required by a Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grand or loan conditions.

☐ YES (complete the following table)☒ NO (go to Item IV-B)

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS		3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE	
	a. NO.	b. Source of Discharges		a. REQUIRED	b. PROJECTED

B. **OPTIONAL:** You may attach additional sheets describing any additional water pollution control programs (or other environmental projects which may affect your discharges) you now have underway or which you plan. Indicate whether each program is not underway or planned, and indicate your actual or planned schedules for construction.☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED